

Exhibit 21

Deposition of Dana F. White – Volume 2
(August 9, 2017)
(excerpted)

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)
FITCH, on behalf of)
themselves and all others)
similarly situated,)
)
Plaintiffs,)
)
vs.) Case No.
) 2:15-cv-01045-RFB-(PAL)
)
ZUFFA, LLC, d/b/a Ultimate)
Fighting Championship and)
UFC,)
)
Defendant.)
)

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF DANA F. WHITE

AFTERNOON AND EVENING SESSIONS

LAS VEGAS, NEVADA

AUGUST 9, 2017

4:01 P.M.

REPORTED BY:
MICHELLE R. FERREYRA, CCR No. 876
JOB NO. 51036-B

	285		287
1		1	
2	I N D E X (Continued)	2	LAS VEGAS, NEVADA, WEDNESDAY, AUGUST 9, 2017;
3	Exhibit 79 Dana White, Wanderlei Silva 358	3	4:01 P.M.
4	was paid \$97 by the UFC, by	4	-00O-
5	Nate Wilcox, September 27, 2014	5	
6	Exhibit 80 Portuguese article from Globo 360	6	VIDEOGRAPHER: The time is approximately
7	Exhibit 81 Video excerpt from 361	7	4:01 p.m. Let the record reflect Michelle Ferreyra is
8	September 11, 2013 from UFC	8	now the court reporter. We are back on the record.
9	Tonight Interview	9	(Exhibit 61 marked.)
10	Exhibit 82 Excel spreadsheet 363	10	
11	Exhibit 83 News article from the 394	11	EXAMINATION
12	Las Vegas Sun	12	BY MR. DELL'ANGELO:
13	Exhibit 84 MMA Junkie article 403	13	Q. Mr. White, I'm going to hand you what I have
14	Exhibit 85 Two-page article dated 405	14	marked as Exhibit 61 to the deposition. Exhibit 61 is
15	June 10, 2012 from Damen Martin	15	from FoxSports dated December 12, 2013 by Damen Martin.
16	Exhibit 86 July 2, 2013 video from 406	16	Before we took our break, we were talking about
17	UFC 162 Post-fight Scrum in	17	Invicta. Do you recall that?
18	Las Vegas, Nevada	18	A. Yes.
19	Exhibit 87 Excerpt from April 16, 2014 408	19	Q. Okay. You're quoted at the bottom here
20	Tough Nation's Finale Post-fight	20	as -- do you see that quote, that it's in kind of a
21	Media Scrum in Quebec City,	21	larger font there --
22	Quebec, Canada	22	A. Yes.
23	Exhibit 88 Video excerpt dated May 11, 2014 410	23	Q. -- okay, at the bottom? And it says, "The
24	UFC Fight Night 40, Post-fight	24	girls who go into Invicta can now look and say, Jesus,
25	Scrum in Cincinnati, Ohio	25	we're going to fight in the UFC some day." Do you see
	286		288
1		1	DANA WHITE - HIGHLY CONFIDENTIAL
2	I N D E X (Continued)	2	that?
3	Exhibit 92 Article taken from TMZ from 421	3	A. Yes.
4	March 6, 2017	4	Q. Did you say that?
5	Exhibit 93 Article from MMA Junkie, 423	5	A. I don't remember saying it, but, yeah. I'm
6	Exhibit 94 Two-page e-mail series, 442	6	sure I did.
7	WME_ZUFFA_001417791	7	Q. Okay. Any reason to believe that that's not
8	Exhibit 95 Video excerpt from 448	8	accurate, that statement?
9	March 14, 2014 from the	9	A. No.
10	UFC 171 Pre-fight Scrum in	10	Q. Okay. And what is that? What do you take
11	Dallas, Texas	11	that to mean, that statement?
12	Exhibit 96 Video Excerpt from 451	12	A. It means that I -- I was the guy that said
13	April 16, 2014 Tough Nation	13	women would never fight in the UFC. And when
14	Finale Post-fight Scrum in	14	women -- you know, when I did decide to do it, it
15	Quebec City, Canada	15	be -- it was huge. It became very big. And, you know,
16		16	I'm sure a lot of these women that were in this
17		17	division thought they would never fight in the UFC.
18		18	Q. So it's a big deal to get -- have female
19		19	fighters in the UFC?
20		20	A. It became a big deal, yeah.
21		21	Q. And it's certainly a big deal for the female
22		22	fighters as well; right?
23		23	A. Absolutely.
24		24	Q. Okay. And -- and that became an important
25		25	part of your business, the UFC's business?

3 (Pages 285 to 288)

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1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	A. Correct.	2	litigation. I'm marking them as Exhibit 62.
3	Q. It actually it lead to the rise of champions	3	(Exhibit 62 marked.)
4	like Rhonda Rousey; right?	4	BY MR. DELL'ANGELO:
5	A. Yeah.	5	Q. Exhibit 62 begins with 2699687.
6	Q. And she became a big star; right?	6	A. I'm sorry, 62?
7	A. Huge star.	7	Q. Yes.
8	Q. Okay. So would you flip to the second page	8	A. Oh, no. No page.
9	of the document, please, at the top. You appear to be	9	Q. I'm just identifying the exhibit number --
10	quoted again. Do you see that at the beginning of Bad	10	A. Okay.
11	As? Do you see that language?	11	Q. -- for the record, Mr. White. And I -- I
12	A. Yes.	12	will tell you that it's my understanding that the
13	Q. But would you first read -- read that first	13	compilation of text messages at Exhibit 62 were taken
14	sentence there aloud?	14	from your -- one of your devices, Mr. White.
15	A. Aloud?	15	A. Okay.
16	Q. Yeah.	16	Q. So would you turn to page 78 of Exhibit 62,
17	A. "As bad as people don't want to believe it,	17	line 1600.
18	they don't want to hear it, meaning the other owners of	18	A. Tell me the page again.
19	other mixed martial arts organizations, that's why they	19	Q. 7-8, 78.
20	are -- that's why they all are -- they all are the AAA	20	A. Okay.
21	to the UFC."	21	Q. Are you at page 78?
22	Q. Okay. Any reason to believe that you did not	22	A. Yeah.
23	say that in December of 2013?	23	Q. Okay. And would you go to line 1600, please.
24	A. No.	24	A. Yes.
25	Q. Okay. And you believed that to be true at	25	[REDACTED]
	290		292
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	that time?	2	[REDACTED]
3	A. I believe it to be true today.	3	[REDACTED]
4	Q. Okay. And would that include World Series of	4	[REDACTED]
5	Fighting?	5	[REDACTED]
6	A. Yes.	6	[REDACTED]
7	Q. Okay. And the -- the World Series of	7	[REDACTED]
8	Fighting hasn't promoted any events in the	8	[REDACTED]
9	United States; right?	9	[REDACTED]
10	A. Yes.	10	[REDACTED]
11	Q. Oh, I'm sorry.	11	[REDACTED]
12	A. They're from the United States.	12	[REDACTED]
13	Q. Withdraw that. I was thinking of something	13	[REDACTED]
14	different. Thank you.	14	[REDACTED]
15	A. They're -- they're actually from Vegas.	15	[REDACTED]
16	Q. Yeah.	16	[REDACTED]
17	The World Series of Fighting has released	17	[REDACTED]
18	some of its fighters to the UFC; right?	18	[REDACTED]
19	A. Yes. We have signed guys from their	19	[REDACTED]
20	organization?	20	[REDACTED]
21	Q. What about Jessica Aguilar, she was released	21	[REDACTED]
22	to the UFC; right?	22	[REDACTED]
23	A. I don't know.	23	[REDACTED]
24	Q. Okay. Mr. White, let me hand you another	24	[REDACTED]
25	compilation of text messages that were produced in this	25	[REDACTED]

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**
2 **BY MR. DELL'ANGELO:**
3 **Q. This is taken from an August 23, 2014 UFC**
4 **Fight Night 48 Post-Night Scrum in Macau, China. So if**
5 **you would direct your attention to the video screen.**
6 MR. ISAACSON: I will object to the use of
7 this video in questions on the basis of completeness.
8 (Video clip playing.)
9 REPORTER: One more thing. There's a couple
10 of ONE FC. You got RUFF, a little tiny one, but
11 they're doing good work. And a couple others, Kunlun
12 and some others. A lot of times, UFC has bought out
13 their competitors, and it really helped out and did a
14 lot, like Strikeforce. Do you guys have plans like
15 that? Is that how you think over there?
16 MR. DANA WHITE: No. You know, to have -- to
17 have grassroots companies like that is great for us.
18 You have to have it. I mean, we -- we need
19 organizations like that around for the guys to get
20 experience, get fights under their belt, make some
21 money, and -- and -- and start to consider making this
22 a career. So having small organizations out there is a
23 great thing. It's not a -- you know, I love it.
24 **BY MR. DELL'ANGELO:**
25 **Q. So, Mr. White, in August --**

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1 DANA WHITE - HIGHLY CONFIDENTIAL
2

14 Q. So are you familiar with a fight promotion
15 ONE FC?

16 A. Yes.

17 Q. Okay.

18 A. Very familiar.

19 Q. Is it correct that ONE FC only promotes MMA
20 bouts in Asia?

21 A. Yes.

22 Q. Okay. And when did you -- well, let's -- I'm
23 going to play another video excerpt for you.

24 (Exhibit 63 marked.)
25 \\

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**
2 MR. ISAACSON: I am just going to raise an
3 objection, that because parts of that were hard to hear
4 I don't think the court reporter's able to create a
5 transcript of it. So --
6 BY MR. DELL'ANGELO:
7 **Q. Mr. White, in August of 2014, did you view**
8 **ONE FC as a -- as a grassroots promotion?**
9 A. Yes.
10 **Q. Okay. And but you, nevertheless, thought**
11 **that having a smaller promotion, like ONE FC out there**
12 **at the time, was a -- was a good thing for the UFC;**
13 **right?**
14 A. I will tell you what -- I will tell you what
15 drives me crazy, what cracks me up, is we're trying to
16 get into Asia; so we have been working on Asia for a
17 long time. And every time I do interviews over there,
18 they say, "Are you guys like ONE FC? Is that what you
19 are." Yeah. Yeah. So it's owned by a billionaire.
20 And every time I do interviews in Asia, they ask if the
21 UFC is like ONE FC. What are you guys, like ONE FC?
22 Yeah, no. We're like the UFC, but yeah. They're not a
23 minor grassroots organization. They're a monster.
24 **Q. In Asia?**
25 A. Yeah.

<p style="text-align: right;">429</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 question. 3 MR. ISAACSON: You went low on that. 4 BY MR. DELL'ANGELO: 5 Q. Okay. I will withdraw it. Let me ask it 6 again. 7 Was it -- was it your view that if a fighter 8 wanted to be in the EA Sports video game, you didn't 9 want that fighter in the UFC? 10 A. I -- I wanted guys in the UFC that wanted to 11 be with the UFC. Did you want to be with the UFC? Do 12 you want to be a world champion here? Do you want to 13 be on our platform on this video game to help, you 14 know, market you, build the brand, and, you 15 know -- yeah. 16 Q. Right. But I -- I guess -- what -- what I'm 17 trying to understand, was it -- was it your view that 18 if a fighter elected to be in the EA Sports game, you 19 didn't want that fighter in the UFC because you didn't 20 feel that that fighter was supporting UFC? 21 A. Why -- why do you want to be here? Do you 22 want to be here or do you not want to be here? 23 Q. Okay. 24 A. It's pretty simple. 25 Q. So being -- from your perspective, a</p>	<p style="text-align: right;">431</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 ban reporters. 3 Q. You can take away their press credentials; 4 right? 5 A. You can take away their credentials. 6 Q. Okay. 7 A. They can still come to the event and cover 8 the event, yeah. 9 Q. Okay. You just have to buy a ticket; right? 10 A. Exactly. 11 Q. But if you have press credentials -- 12 A. Or they could buy the pay-per-view. 13 Q. Right. Or if you -- but if you have press 14 credentials, you wouldn't need to purchase the 15 pay-per-view or ticket to attend the event to cover it; 16 right? 17 A. It's completely discretionary on who we give, 18 you know. 19 Q. And so you -- you've withdrawn press 20 credentials from Ariel Helwani; right? 21 A. Absolutely. 22 Q. Okay. And he's an MMA journalist whom we saw 23 in a number of videos earlier today; right? 24 A. Yeah. 25 Q. Are there other MMA journal -- journalists</p>
<p style="text-align: right;">430</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 fighter's choice to be in the EA Sports video game was 3 tantamount to a choice of not being, you know, here at 4 the UFC, as you put it; right? 5 MR. ISAACSON: Objection to form. 6 THE WITNESS: Do you want to be with the UFC? 7 BY MR. DELL'ANGELO: 8 Q. Right. 9 A. Do you want to be here? 10 Q. So -- 11 A. You're going to -- you're going to come fight 12 here, and then go elsewhere to -- to -- to build a 13 different video game for another company. 14 Q. So being in the EA Sports video game 15 was -- was basically not being with the UFC? 16 A. I answered the question three times. 17 MR. ISAACSON: He's correct. 18 BY MR. DELL'ANGELO: 19 Q. Okay. I think that's a matter of judgment, 20 I'm sure. 21 And you've -- you've banned some MMA 22 reporters; right? 23 A. Yes. 24 Q. And what MMA reporters have you banned? 25 A. Well, I didn't ban anybody. You can't really</p>	<p style="text-align: right;">432</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 from whom the UFC has revoked press credentials? 3 A. Yeah. Well, I -- I -- I didn't revoke his 4 press credential. I threw him out one night. 5 Q. Threw him out -- 6 A. He was right back for the next event; so I 7 didn't -- I didn't -- that wasn't the case with him. 8 Q. Well, there was actually a pretty significant 9 public uproar; right, after the -- 10 A. The night I threw him out, yeah. 11 Q. Right. 12 A. He was crying on TV and radio, yeah. 13 Q. And in response, the UFC did an about face 14 and let him back in? 15 A. No. No, no, no. 16 [REDACTED]</p>

1	DANA WHITE - HIGHLY CONFIDENTIAL	433	DANA WHITE - HIGHLY CONFIDENTIAL	435
2	[REDACTED]		Q. Okay. And that training camp generally requires them to be away from their family for some period of time?	
3	[REDACTED]		A. Yes.	
4	[REDACTED]		Q. Okay. And --	
5	[REDACTED]		A. Some of them. Some of them do, and some of them don't.	
6	[REDACTED]		Q. Right. And UFC fighters pay for their own camp; right?	
7	[REDACTED]		A. Correct.	
8	[REDACTED]		Q. Okay. And paying for their own camp involves paying for fighters -- or excuse me, for trainers?	
9	[REDACTED]		A. Yep.	
10	[REDACTED]		Q. Okay. And does it involve their -- they pay for their housing associated with the camp, if they're not living at home, generally?	
11	[REDACTED]		A. Well, do you know what? That's not true, actually. We just built the -- the Performance Institute. Every fighter that's under contract with us can go there and train for free.	
12	[REDACTED]		Q. Right. But prior to that, though --	
13	[REDACTED]		A. Yes.	
14	[REDACTED]		Q. And -- and that only just opened; correct?	
15	[REDACTED]		A. Yes.	
16	[REDACTED]	434	DANA WHITE - HIGHLY CONFIDENTIAL	436
17	DANA WHITE - HIGHLY CONFIDENTIAL		Q. Okay. So -- so prior -- and when did it open?	
18	[REDACTED]		A. Three months ago, something like that.	
19	[REDACTED]		Q. Okay. So before, you know, this period for the three months that the center's been open --	
20	[REDACTED]		A. (Witness nods.)	
21	Q. What do fighters have to do to -- in your experience, what do fighters have to do to prepare to compete in an MMA bout for UFC?		Q. -- fighters needed to, you know, pay for their own housing, right, if they're weren't living at home while they're in camp training for a fight?	
22	A. It varies. It's -- it's all different.		A. True.	
23	Obviously, there's lots of different camps out there and lots of different ways that people train. And but -- but it's -- it's all different. There's no one significant way to train.		Q. Okay. And they paid for things like supplements and any special meals; right?	
24	Q. Well --		A. Correct.	
25	A. Everybody does something different.		Q. That that is part of their training?	
26	Q. -- I think -- I think I -- I appreciate that.		A. Correct.	
27	I think I was asking something a little bit different.		Q. And they also paid for certain travel associated with their -- with their camp; right?	
28	In advance of a -- competing in a UFC mixed martial arts bout, a fighter needs to train as a mixed martial artist; right?		A. Yep.	
29	A. Train, yes.		Q. Okay. What other sorts of things did fighters pay for on their own in connection with preparing for a fight in the -- in the UFC, in your experience?	
30	Q. Okay. And when they have a bout coming up, fighters typically participate in a camp, a training camp; right?		A. I don't know. I mean, you know, everything involved -- involved with their training camp. However	
31	A. Correct.			

<p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 extravagant it is to however minimal it is -- you know, 3 it's all that stuff. But, yeah. 4 And -- and, you know, depending on how many 5 people they get involved and everything else, but 6 that's every combat sport ever. Boxing, kick boxing, 7 Muay Thai, the list goes on and on. They all paid for 8 their camps. Now we figured it out. So guys who are 9 under UFC contract don't have to pay for it anymore. 10 We have everything from, you know, hot and 11 cold plunge cryo chambers. We have everything a 12 fighter needs. We even have physical therapists. They 13 get free physical therapy. They eat for free. 14 They -- we have a -- we have a restaurant there, and 15 all their food is free. All their supplements are 16 free. And they have a dietician and everything. So 17 fighters don't have to pay for anything anymore in the 18 UFC. 19 Q. That -- that's only in the last three months; right? 20 A. Yeah. But it's going on now forever. 21 Q. Okay. 22 A. I'm just pointing out another thing that's 23 never been done in the history of combat sports. 24 Q. It -- it has been done in many other sports</p>	<p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 in the sport? Zero. 3 Q. And is it your view that that will continue for boxing? 4 MR. ISAACSON: Objection. 5 THE WITNESS: Not until I get into it. 6 BY MR. DELL'ANGELO: 7 Q. Okay. That's what I was curious about. 8 Some fighters for the UFC have tried to 9 engage in activities outside of the UFC to generate 10 revenue such as being his movies; right? 11 A. Yep. 12 Q. Okay. And is it true that you've often had an issue with fighters who are under contract with the UFC, but also want to appear in a movie? 13 A. No. Never. I love it. I -- I love that 14 these guys get the opportunity to be in movies and 15 everything. It's another thing that builds the brand 16 and everything else. What I don't like is when we're 17 not aligned, when we're not communicating, you know. 18 But -- but as long as we're communicating on when this 19 stuff is going to happen, I love it. 20 Michael Bisping has been out shooting movies 21 now for the last four to five months. 22</p>
<p>25</p> <p>438</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 however, though; right? 3 A. Not fighting. 4 Q. I'm asking about other sports. 5 A. Yeah. 6 Q. You were pretty adamant -- you were pretty adamant about comparing other sports before; right? 7 A. Right. 8 Q. I want to be clear, that in other sports, such as football, for example, things like training and housing and transportation and food -- 9 A. Yeah. 10 Q. -- those things have been covered for ages in those sports. 11 A. Yeah. And that was our dream. Our dream was 12 to get to a point -- you have to understand, this 13 sport's still young. All these other sports you're 14 talking about are 100 years old or 50 years old or 60 15 or whatever it is. We're 15. We're 15 years old, and 16 look where we are already and -- and how much we've 17 changed the game and -- and -- and done things that 18 have never been done ever in the history of combat 19 sports. Look at the hundreds of billions of dollars 20 that boxing has made over the last hundred years. Do 21 you know how much more has been reinvest -- reinvested</p>	<p>25</p> <p>440</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>